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November 13, 2001

VIA E-MAIL

PUBLIC VERSION

The Honorable Robert B. Zoellick
U.S. Trade Representative
OFFICE OF THE U.S. TRADE REPRESENTATIVE
600 17th Street, N.W.
Washington, D.C. 20508

*Confidential Business Information Has Been Deleted
from Page 4 of This Letter*

cc: Mr. Andrew Stephens
DIRECTOR FOR STEEL TRADE POLICY

Re: Exclusion Request for Galvanized Dual Phase Coated Steel Products
Section 201 Investigation — Steel

Dear Mr. Ambassador:

On behalf of RAUTARUUKKI OYJ, a Finnish producer of steel products, we respectfully request the exclusion of galvanized dual phase coated steel flat products from any remedy imposed by the PRESIDENT as a result of this Section 201 investigation. In accordance with the notice published by the OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE on Friday, October

PUBLIC VERSION

26, 2001,^{1/} we hereby provide the requested information to support this request. Additional information about this product is also contained in nonconfidential Exhibit A which appears in the accompanying ADOBE Acrobat (“.pdf”) file.

For ease of reference, we have provided the required information in the same order in which it was requested in the *TPSC Public Comments Notice*:

- (1) *The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States*

RAUTARUUKKI OYJ requests the exclusion of galvanized dual phase coated steel sheet and strip which are classifiable under subheadings 7210.30.00 and 7210.49.30 of the *Harmonized Tariff Schedule of the United States*.

- (2) *A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought*

RAGAL® LITEC DPF is the brand name of RAUTARUUKKI’s hot dip galvanized dual phase steels.^{2/} These products are low alloy steels with a multiphase microstructure, and they are ideally

^{1/} *Trade Policy Staff Committee: Public Comments on Potential Action under Section 203 of the Trade Act of 1974 with Regard to Imports of Certain Steel*, 66 Fed. Reg. 54,321 (October 26, 2001) (hereinafter, the “*TPSC Public Comments Notice*”).

^{2/} See Exhibit A (RAUTARUUKKI Product Brochure: “RAGAL® LITEC DPF Dual Phase (continued...)”).

suited as safety components in automotive construction due to their high strength, good formability, and high strain hardening potential. For example, RAGAL® LITEC DPF steel is used in the construction of side impact beams for the passenger doors of automobiles; other automotive components with a high crash relevancy, such as bumpers, pillars, cross beams and frames, are also possible candidates for RAGAL® LITEC DPF steel. RAUTARUUKKI produces five steel grades of this product, with thicknesses ranging from 0.70 to 1.60 millimeters and with tensile strengths from 600 to over 1000 N/mm².^{3/}

(3) *The basis for requesting an exclusion*

To the best of our knowledge, RAUTARUUKKI is the only producer of galvanized dual phase coated steel products. There is no known U.S. production of these products.

(4) *The names and locations of any producers, in the United States and foreign countries, of the product*

None.

^{2/}(...continued)
Steels”).

^{3/} See Exhibit A.

- (5) *Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection*

RAUTARUUKKI's hot dip galvanized dualphase steels are a recently developed innovation, hence it is difficult to predict future demand for these products.

TOTAL U.S. CONSUMPTION	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005
QUANTITY	[]
VALUE	[]

- (6) *Total U.S. production of the product for each year from 1996 to 2000, if any*

TOTAL U.S. PRODUCTION	1996	1997	1998	1999	2000
(IN NET TONS)	0	0	0	0	0

- (7) *The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.*

TOTAL U.S. PRODUCTION OF SUBSTITUTE	1996	1997	1998	1999	2000
	N/A	N/A	N/A	N/A	N/A

In accordance with the *TPSC Public Comments Notice*, we are submitting this exclusion request not later than noon on Tuesday, November 13, 2001. In addition, we have elected to file this request electronically to FR0001@ustr.gov, as provided in the *TPSC Public Comments Notice*.

* * *

RAUTARUUKKI requests proprietary treatment for confidential business information deleted from page 4 of this letter which contains information related to RAUTARUUKKI's sales and marketing practices. Disclosure of such information would cause substantial competitive harm to RAUTARUUKKI. Pursuant to 15 C.F.R. § 2003.6, the term "PUBLIC VERSION" appears on every page in which confidential business information has been deleted.

A business confidential version of this letter is being submitted today under separate cover.

Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted,

/ s /

Frederick P. Waite
Kimberly R. Young

Counsel for RAUTARUUKKI OYJ

Attachment